

Re: Granite Point Platform AKG 315015 - auth coverages Cindi Godsey to: Richard Cool



02/04/2013 12:10 PM

I flunked history and my memory is bad. But I do have their NOI from last year's reapplication process.

They did not apply for coverage for 007, 009, 010 or 011 but they did apply for 015. Table 7-B1 of the 2007 Permit indicates that the Platform did have coverage.

Richard Cool Hi Cindi: I am contacting you to see if you have a... 02/04/2013 10:50:39 AM

Richard Cool/R10/USEPA/US From: Cindi Godsey/R10/USEPA/US. To: Diane Davis/R10/USEPA/US@EPA

Date: 02/04/2013 10:50 AM

Granite Point Platform AKG315015 - auth coverages Subject:

Hi Cindi:

I am contacting you to see if you have any historical documents, memory or comments addressing the following issues in regard to the Granite Point Platform's (AKG315015) authorized or non-authorized discharges. I give you some context and then my preliminary determinations.

Issue: The main issue is clarifying whether the following three (3) discharges are authorized:

- 007-boiler blowdown
- 009-NCCW
- 015-produced water

ICIS: For context, ICIS does not show any authorization for the following five (5) discharge/outfalls;

- 007-boiler blowdown
- 009-NCCW
- 010-uncontaminated ballast water
- 011-bilge water
- 015-produced water

I find nothing in the files that disputes that 010-ballast and 011-bilge discharges are *not* authorized so these are not issues here.

DMR Submissions: A review of DMRs in the last 2-3 years shows that both

Chevron and Hilcorp are submitting DMRs for 007-boiler blowdown and 009-NCCW. There never are DMRs for 010-ballast, 011-bilge or 015-produced water.

<u>August 2003 Reapp</u>: This reapplication did not contain discharge effluent data sheets for 007 and 009-011. It did included such a data sheet for produced water, 015.

<u>Dec. 2011 NOI Reapp</u>: Chevron's December 2011 NOI (page 2 - Discharges, Check All That Apply) has *no check marks* for 007-boiler blowdown, 009-NCCW, 010-ballast and 011-bilge. Chevron did check 015-produced water.

<u>Doc Review</u>. I reviewed the Space Saver files and cannot locate an NPU Discharge Authorization letter for the 2007 GP. I have reviewed the 2007 GP, the 2007 GP's fact sheet and RTC.

Prelim Determinations:

015-Produced Water: I read the 2007 GP, Section II.G., Table 7-B1, to authorized produced water discharge from the Platform. There is text in the FS and RTC indicating that Chevron must have sought this discharge authorization even though the historic practice and current practice is to send all PW to the Granite Point Prod Facility/Tank Farm. Based on our 2012 inspection, I have no current information indicating that produced water was ever discharged in the recent years, including since Hilcorp took over operations in December 2011. In my view, it appears that ICIS might not be correct in regard to 015.

007-boiler blowdown & 009-NCCW: I cannot find any documentation indicating that EPA ever authorized these two discharges. I speculate that Chevron made an error in devising their DMR forms and that the inclusion of these two waste streams in their DMR submissions is an oversight/mistake.

Any insights,	comments,	other documents, etc.	appreciated.	Call if you prefer to
discuss.				

Thanks.

Rick